

1 Constantine P. Economides (*pro hac vice*)
(Florida Bar No. 118177)
2 Brianna K. Pierce
(CA Bar No. 336906)
3 FREEDMAN NORMAND
FRIEDLAND LLP
4 1 SE 3rd Avenue, Suite 1240
Miami, FL 33131
5 Tel: (305) 971-5943
Email: ceconomides@fnf.law
6 bpierce@fnf.law

7 *Counsel for Plaintiff*

8 **UNITED STATES DISTRICT COURT**
9 **NORTHERN DISTRICT OF CALIFORNIA**
10 **SAN JOSE DIVISION**

11 ARIEL ABITTAN,

12 Plaintiff,

13 v.

14 LILLY CHAO (A/K/A TIFFANY
CHEN, A/K/A YUTING CHEN) et al.,

15 Defendants.
16
17
18
19
20
21
22
23
24
25
26
27

Case No. 5:20-CV-09340-NC

**DECLARATION OF CONSTANTINE P.
ECONOMIDIES IN SUPPORT OF
PLAINTIFF'S MOTION FOR EXTENSION
OF TIME**

28 DECLARATION OF CONSTANTINE P.
ECONOMIECONOMIDIES IN SUPPORT OF
PLAINTIFF'S MOTION FOR EXTENSION OF
TIME

CASE No. 5:20-CV-09340-NC

1 I, Constantine P. Economides, declare as follows:

2 1. I am an attorney licensed to practice law in the States of New York, Florida, and
3 Washington D.C., and am admitted to practice before this Court *pro hac vice*. I am a partner with
4 the firm Freedman Normand Friedland LLP, and counsel for Plaintiff Ariel Abittan ("Plaintiff"). I
5 make this declaration based upon my knowledge of the facts stated herein, and if called to testify,
6 I could and would testify competently thereto. I submit this declaration in support of Plaintiff's
7 motion for extension of time to respond to the Hansen Law Firm's Bill of Costs.

8 2. Plaintiff's deadline to respond to the Hansen Law Firm's Bill of Costs is June 30,
9 2023. *See* ECF No. 200.

10 3. I have been in trial in Florida every day from Monday, June 26, 2023, to Thursday,
11 June 29, 2023, and I have an in-person mediation in Los Angeles on June 30, 2023. My colleague,
12 Brianna Pierce, is on a preplanned vacation. As a result, I am requesting additional time to review
13 and respond to the Hansen Law Firm's Bill of Costs (*see* ECF No. 199). Therefore, I am requesting
14 a modest extension, up to and including July 7, 2023.

15 4. Absent this extension, Plaintiff will be unduly prejudiced in formulating a response
16 to ECF No. 199.

17 5. The previous time modifications in this case include extension of Defendants' time
18 to respond to the Complaint (ECF Nos. 21, 24, 31, 44, 95), Defendants' time to respond to a Motion
19 for an order allowing alternative service (ECF No. 97), the case management conference (ECF Nos.
20 22, 44, 67, 79, 90, 111, 116, 127, 151, 156, 170, 192), and Plaintiff's deadline to serve Defendants
21 by alternative means (ECF No. 113). This is the first request for an extension of time to respond to
22 ECF No. 199.

23 6. The requested time modification will not impact the schedule for this case,
24 particularly because Plaintiff has moved to voluntarily dismiss the case.

25 7. On June 29, 2023, I emailed all counsel and asked whether there would be an
26 opposition to the requested extension. The Hansen Law Firm stated that they would oppose the
27 request. *See* Exhibit A.

28 DECLARATION OF CONSTANTINE P.
ECONOMIDES IN SUPPORT OF
PLAINTIFF'S MOTION FOR EXTENSION OF
TIME

CASE No. 5:20-CV-09340-NC

Dated: June 29, 2023

Respectfully Submitted,

/s/ Constantine P. Economides

Constantine P. Economides (*pro hac vice*)

Counsel for Plaintiff